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Digital Shape Technologies Inc.  
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Montréal, February 11, 2016

By Courier

**Glassdoor.ca**  
C/o Legal Department  
1 Harbor Drive  
Suite 300  
Sausalito, California 94965  
USA

Re: **Posts and comments regarding Digital Shape Technologies Inc.  
published on [www.glassdoor.ca](http://www.glassdoor.ca)**

Sir, Madam,

We are the attorneys of Digital Shape Technologies ("DST") and its President, M. Radomir Nikolajev (hereinafter collectively "**our Clients**"), who have instructed us to send you the present letter.

On March 7, 2013, our Clients were the subject of highly damaging false and defamatory posts (the "**Posts**"), published on your website [www.glassdoor.ca](http://www.glassdoor.ca) (the "**Site**"), a copy of which is attached to this letter. For information purposes, the Posts have since been removed.

Our Clients identified a former employee of DST as being the author of at least one of the Posts and has filed a defamation suit in order to protect their honour and reputation against illicit attacks of this nature, made using your Site.

In the context of this action, our Clients must obtain additional information regarding the number of people having read and/or commented the Posts in order to evaluate the extent of the damages that they have suffered resulting from same. It is highly relevant for our Clients to determine whether any actual or potential clients, employees, service providers or competitors have read the false and defamatory Posts, as well as whether any of their competitors or former employees have commented the Posts, or encouraged them by claiming that they were "helpful", thereby aggravating the damages.



Borden Ladner Gervais

In view of the foregoing, we respectfully ask that you provide us with the following information:

- 1) a copy of all comments made with respect to DST, notwithstanding the fact they have since been removed, the email addresses, names and IP addresses of the individuals who posted such comments, the URL corresponding to the submission of such forms, as well as the submission date;

If this information is not available, we would ask that you provide us any and all relevant information which would help trace such data;

- 2) the number of individuals having read the Posts and the comments, their email addresses, names and IP addresses, when such information is available, the URL corresponding to the visited page and the date of the visit;
- 3) the number of individuals having indicated that the Posts and/or comments were "helpful", their IP addresses, email addresses and names, the URL corresponding to the submission of such forms, as well as the submission date.

We await your confirmation that you will be able to provide us with the information requested in points 1 to 3 outlined above, in the twenty (20) days of receipt of this letter.

Furthermore, our Clients have suffered and continue to suffer significant harm resulting from the false and defamatory statements regarding DST and its management which have been published on your Site. This publication continues to project a negative image of DST's business and to undermine the confidence of the public and of DST's customers in DST, and consequently to drive away the public and DST's customers from using its goods and services. Moreover, our Clients have had to invest resources in order to attempt to identify the author(s) of such defamatory comments, who hide behind the anonymity that is provided by your Site, as well as significant resources to determine the extent of damages suffered. In order to reduce the extent of these damages, our Clients ask that all present and future references to DST, or its President, M. Radomir Nikolajev, be withdrawn or excluded from your Site, for as long as your Site enables individuals to publish comments anonymously. Alternatively, we ask you that your Site immediately remove any defamatory comments on demand from our Clients and provide our Clients with all the relevant information regarding the author(s) of such comments and the extent of their dissemination.

We thank you for your collaboration in this matter.

Sincerely,

BORDEN LADNER GERVAIS

Tommy Tremblay  
Encl.